

Comments on the 2012 Draft Power Procurement Plan

Submitted to the Illinois Power Agency

by Shannon Fulton, Senior, Renewable Energy, Illinois State University

Thank you for providing the opportunity to submit comments on the 2012 Draft Procurement Plan (the “Draft Plan”). The Solar Carve Out in the Illinois Renewable Energy Standard (RES) is one of the most aggressive solar mandates in the nation. If fully and strategically implemented, this policy could be an engine for job growth and economic development in Illinois.

The Draft Plan does not specify a separate procurement program proposed for small and mid-size rooftop and ground-mounted systems. Without a separate procurement program, it is likely that our state’s very aggressive Solar Carve Out (which will require output from about 600 MW of installed solar by 2015) will be met entirely with SRECs from utility-scale solar projects, some located outside of Illinois. The Draft Plan proposes to buy all SRECs (solar renewable energy credits) needed to comply with the Illinois Solar Carve Out through a competitive auction (similar to previous IPA auctions) designed with large, utility-scale projects in mind. If past procurements serve as an example, participation requirements will be too complex and transaction costs will be too high for distributed solar developers and owners to participate.

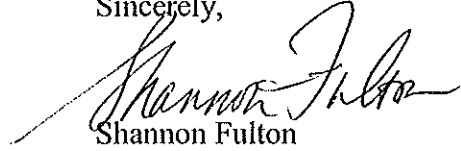
Cutting out small and medium business opportunities would be a big missed opportunity for Illinois. Distributed, rooftop solar systems create jobs, deliver benefits to the distribution grid and produce valuable energy for Illinois residents and businesses. If the IPA started buying SRECs from distributed projects, it would leverage private investment and generate economic development across the state. *As an Illinois native and graduating senior from Illinois State University, I have great pride Illinois and have a strong desire to work in my home state installing rooftop solar. Without a distributed solar program, Illinois will fall behind as neighboring states like Michigan and Ohio reap the benefits of solar development.*

Solar module prices have plummeted in the last two years and rooftop solar has never been more cost-effective. “Fuel” costs are zero, transmission costs are zero, and distributed solar delivers benefits to the electric distribution system by providing power at peak hours when other generation resources are at their most expensive.

I respectfully recommend that the IPA modify the Draft Plan to include language stating affirmatively that the Agency will (1) create a procurement program for solar renewable energy credits (SRECs) from distributed solar energy systems; (2) implement the program over multiple years to encourage sustainable, long-term growth of Illinois’ solar industry; and (3) hold a series

of workshops prior to the Spring 2012 procurement events to seek stakeholder input on program features and implementation procedures. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Fulton", written in a cursive style.

Shannon Fulton

Senior, Renewable Energy,
Illinois State University